

**SUBMISSION TO THE PRODUCTIVITY COMMISSION ON  
THE BACKGROUND PAPER ON THE INDIGENOUS EVALUATION STRATEGY**

**BY**

**THE ALLIANCE OF FIRST NATIONS' INDEPENDENT EDUCATION AND TRAINING PROVIDERS**

## **Introduction**

This Submission has been prepared by the Alliance of First Nations' Independent Education and Training Providers (the Alliance) and is based on the "Alliance Proposal" presented to the Commonwealth Government on 13 August 2019. The Alliance currently consists of four entities:

- Tauondi Aboriginal College (founded 1973 and headquarters Adelaide South Australia)
- Co-operative for Aborigines Ltd trading as Tranby National Indigenous Adult Education and Training (founded 1957 headquarters Glebe NSW)
- NAISDA Ltd (founded 1976 headquarters Kariong NSW)
- Institute for Aboriginal Development (Campus closed in Administration) (founded 1969 headquarters Alice Springs NT)

The Alliance will seek membership of Coalition of Peaks with representation on the Joint Council of Closing the Gap as a peak body for National Indigenous owned Registered Training Organisations (IRTOs).

The Alliance notes that the Productivity Commission has made seven Information Requests as part of the Background Paper. A number of Alliance members attended the video conference on the Indigenous Evaluation Strategy. The Background Paper has been carefully read and considered. The Alliance has provided comments and feedback on each Information Request.

## **Chapter 5 — Evaluating for quality results**

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### *INFORMATION REQUEST 5.1*

*The Commission is seeking information on effective engagement strategies for evaluation. What engagement models are most effective? For what types of evaluations is co-design most useful? Why?*

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Historically Government has often engaged in what has been referred to as "consultation". In many cases "consultation" could best be described as "informing" as decisions have already been made or will subsequently be made without taking into account feedback or alternatively simply ignoring information provided by community during the consultation process. This is particularly the case where feedback or information does not align with the predetermined policy or program guidelines. It is easier to simply ignore the feedback and

information rather than engage with community as to why the feedback or information was not accepted or included in the policy or program.

Alliance members have experience in codesign of policy and program design and a variety of engagement strategies. The most common issues with Indigenous codesign process are:

- the number of people involved in the policy or program codesign process, very large numbers of people sometimes make the process more difficult;
- common goals need to be agreed before the process commences and the goals must then drive decision making, large numbers of people can successfully engage in codesign if their goals are common and well aligned;
- determining how decisions are reached –
  - unanimous – can create problems if one or more people manipulate the decision making process by refusing to agree on a point to push a decision that other people do not agree with;
  - majority – works in some circumstances but can be unwieldy if there is a large group and during the implementation phase;
  - a pre-agreed group or board responsible for distilling the results and implementing them – this can be successful, but the pre-agreed group or board must be accountable for the decisions when they are made;
- Codesign is more time consuming compared to more traditional decision-making process. It can also be expensive if people need to travel or take time off work to participate. In many circumstances, but not all, the outcome can be better and more accepted by community if the outcome is good but not perfect;
- understanding and accepting limitation of the budgets allocated to a program – budgets are limited and priorities need to be established and choices must be made;
- understanding that it is not always within the groups capacity to make some decisions for example there are legislative requirements relating to housing construction and subdivisions. An example in the VET context is the State Government requirements forcing Indigenous learners to complete some courses in a specified timeframe often a semester. At present it is not possible to complete part of a VET course be absent for the balance of the semester due to cultural obligations and then recommence the course part way through the next semester and finish it at the conclusion of the next or any subsequent semester.

The Alliance has in its “Alliance Proposal” recommended engagement with Elders to consider which Indigenous VET courses would provide the most value to adult Indigenous

learners and which courses are most likely to provide a pathway to employment and/or improve wellbeing in their local area. This is particularly important for Indigenous adults in regional, remote and very remote areas where the jobs on the Government's skills list may not exist and trying to mainstream Indigenous learners into inappropriate skills list courses results in them disengaging from adult education. Additionally, Government attempts to mainstream Indigenous adults into unsuitable Certificate III courses when the key problems faced by adult Indigenous learners might be Language, Literacy, Numeracy and Digital Literacy (LLND).

IRTOs provide culturally appropriate and competent training for Indigenous Adults learners. Indigenous Adult learner's needs were not included in the original Closing the Gap policy. The attempts at meaningful engagement were frustrated during the development of the new Closing the Gap targets. The default policy position was to perpetuate the mainstreaming of adult Indigenous learners on the same basis that had already demonstrably been shown to fail.

The Alliance believes a separate Indigenous adult education policy could be developed using a co-design process with Indigenous Registered Training Organisations and Elders from a wide range of geographic areas across Australia. This would involve the codesign process encouraging Elders to identify which Vocational Education and Training is most likely to result in employment for Indigenous adults in their area. Discussing the options with IRTOs about the VET courses that are most likely to result in a transition to employment or self-employment and would meet the needs for culturally competent and appropriate learning.

The codesign would in the first stage involve an understanding by the IRTOs and Elders team of the budget and the setting of clear definition of the goals and deliverables.

The evaluation could for example benchmark Indigenous adults obtaining employment or self-employment after undertaking the courses (e.g. LLND courses or Certificate III) agreed by the Elders and the IRTOs compared to Indigenous adults undertaking mainstream Certificate III courses from the Government mainstream skills list.

## Chapter 6 — What to evaluate

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### INFORMATION REQUEST 6.1

*The Commission proposes that the interim evaluation priorities for the Indigenous Evaluation Strategy be broad and based on the Council of Australian Governments and the Joint Council on Closing the Gap draft policy priorities. Is this appropriate?*

*If so, are there any priority areas missing from those currently identified through the Council of Australians Governments and the Joint Council on Closing the Gap?*

*If not, what specific policy or program areas should be the focus of better quality evaluations?*

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## **Are the evaluation priorities for the IES based on the Joint Council on Closing the Gap the appropriate priorities?**

The Alliance is concerned that the Joint Council on Closing the Gap did not include appropriate priorities for Adult Indigenous learners to obtain LLND skills if necessary and did not include any consideration of which skills and courses were most likely to lead to meaningful employment and an improvement in Indigenous adult wellbeing relevant to the region in which they live.

### **What priority areas are missing?**

A number of priority areas were missed by the Joint Council, many of which have been covered in the media for example:

- clearly defined targets for the reduction in domestic violence against women and children; and
- support for Indigenous businesses; and
- the consideration and development of sustainable local economies for remote Indigenous communities.

A number of Indigenous leaders expressed concern that the Joint Council was focused on welfare and there was insufficient focus on a pathway off welfare and into employment or self-employment and development and support of economically sustainable Indigenous communities.

The Alliance is concerned that there was no properly considered policy for the development of an Indigenous skills list (including skills and courses leading to employment or self-employment in regional remote and very remote areas). There was no discussion or identification of culturally competent and appropriate VET courses that would lead to meaningful employment or self-employment and an improvement in Indigenous adult wellbeing.

### **What specific policy or program areas should be the focus of better quality evaluations?**

#### **Rate of re-offending**

The Alliance members have approached State based corrections departments with proposals to provide culturally competent and appropriate VET for Indigenous prisoners. The Alliance was told that mainstream VET programs were in place and that IRT0 courses were not required.

The Alliance suggests that a program comparing rates of reoffending by Indigenous prisoners who are provided with culturally competent and appropriate VET courses by IRT0s (as recommended by the local Elders) compared to the VET courses currently provided by the various State Department of Corrections may be useful.

## **Provision of IRTO LLND adult courses prior to IRTO Certificate III compared to straight to mainstreaming Certificate III**

The codesign may benchmark students undertaking Certificate I-III LLND skills at IRTOs prior to undertaking Certificate III compared to an equivalent group of Indigenous adults undertaking mainstream Certificate III without undertaking IRTO Certificate I-II LLND skills and IRTO Certificate III. The evaluation could for example compare course completion rates and an assessment of being job ready.

## **Evaluation of Online VET Courses by IRTOs compared to mainstream Online VET courses – success of online courses in general**

Comparison of successful completion of online course assessments by IRTOs Indigenous learners v the equivalent mainstream VET.

Also, a comparison of completion rates for online courses by Indigenous adults compared to the equivalent face to face courses would also be valuable together with an evaluation of how to improve online courses for remote communities.

## **Trial of completion of VET courses over a longer period of time to allow for Indigenous adults to meet Cultural Obligations.**

The Alliance has been concerned that Indigenous adult learners often fail to complete their VET units of competency within the required timeframe due to cultural obligations. Indigenous adult learners VET unit of competency are not credited unless they are completed in the minimum time, usually 6 months. If the Indigenous learners do not complete the units of competency in the required time the assessments and attendance they have completed is not credited to them, for example they may have completed 3 months of the units of competency and the first assessment task. The course cannot be re-commenced at that point of the course (ego immediately after the first assessment task) at a later date.

The Alliance with the approval of the relevant States would like to undertake a trial to allow Indigenous adult VET learners to pause their course to undertake cultural obligations and recommence within 1 – 2 semesters. The goal would be to evaluate whether more Indigenous adult VET learners would complete their VET courses, after a brief pause, if they were able to undertake their cultural obligations without educational penalty.

## **Chapter 7 — Developing a culture of evaluation and learning**

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### *INFORMATION REQUEST 7.1*

*The Commission is seeking participants' views on which current Australian Government agency would be best placed to house the Indigenous Evaluation Clearinghouse: the Australian Institute of Health and Welfare; the Australian Institute of Family Studies; the Australian Institute of Aboriginal and Torres Strait Islander Studies; the Productivity Commission; or some other agency?*

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**The Commission is seeking participants' views on which current Australian Government agency would be best placed to house the Indigenous Evaluation Clearinghouse.**

The Indigenous Evaluation Clearinghouse should be placed with OIPE and be situated within the Productivity Commission. The Alliance's reasons for this view is set out in our response to Information Request 7.2 below.

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*INFORMATION REQUEST 7.2*

*The Commission is seeking participants' views on the location of an Office of Indigenous Policy Evaluation to oversee Australian Government agencies' implementation of the Indigenous Evaluation Strategy. Which current statutory agency would provide the best location for the Office of Indigenous Policy Evaluation, and why?*

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**Which current statutory agency would provide the best location for the Office of Indigenous Policy Evaluation, and why?**

The Alliance believes it is important that the new central advisory and oversight function under the Strategy — an Office of Indigenous Policy Evaluation (OIPE) not be inadvertently limited in its scope by being placed within an agency that is independent of the evaluation process and is not focused on a narrow range of policy issues. For these reasons, the Alliance believes the best agency to house the OIPE is the Productivity Commission. The Productivity Commission could obtain the required Indigenous staff to support this role – other existing Indigenous agencies may indirectly and unintentionally influence OIPE to focus on their own agencies area of interest.

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*INFORMATION REQUEST 7.3*

*The Commission is seeking participants' views on how members of an Indigenous Evaluation Council might be appointed. For example, could members be nominated by the Aboriginal and Torres Strait Islander community controlled sector; for their experience in research, monitoring and evaluation; or based on some other factors? Would the host agency for the Office of Indigenous Policy Evaluation, and/or the Australian Government, need to be members?*

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**The Commission is seeking participants' views on how members of an Indigenous Evaluation Council might be appointed.**

The Alliance refers the Productivity Commission to our response to Information Request 6.1 where it is noted that the Joint Council did not cover a number of key policy areas of concern to the Indigenous community. It is possible that many targets were not included because there was no representation on the Joint Council of bodies with those areas of expertise e.g.

Indigenous adult VET, Indigenous businesses and the development of local Indigenous economies.

The Indigenous Evaluation Council should not be simply dominated by Indigenous members with a pure welfare focus, it needs a balance of Indigenous members able to encourage a focus on:

- supporting the evaluation of proposals for adult VET including LLND and higher education with the goal of meaningful employment, self-employment and wellbeing;
- considering and evaluating proposals to support the creation of successful Indigenous owned and run businesses;
- considering and evaluating proposals for the creation and support of economically sustainable Indigenous communities in urban, regional, remote and very remote areas.

The Alliance notes the comments made during the Productivity Commission video conference that there is a shortage of Indigenous adults with a background in economics, policy and program evaluation.

The Alliance is of the view that Indigenous Council members without the relevant educational or employment background in economics, policy and program evaluation should not be excluded from the Council for those reasons. Alliance members are considering obtaining accreditation for:

- A variety of micro-credentials to improve Indigenous understanding of evaluation and also basic principles of economics including basic demand and supply, introduction to statistics and introduction to probability, and understanding simple cost benefit analysis;
- the micro-credentials would be accredited for a subsequent registered Certificate IV course on Evaluation Skills for Indigenous Policies and Programs;
- Certificate IV and Diploma in Indigenous Policy Evaluation would need to be accredited for a university level economics program.

Micro-credentials would provide basic understanding of the evaluation process and allow Council members undertaking the course to also learn by doing. It is important for Indigenous Council members to be able to learn by doing. Very few Indigenous Council members will possess the relevant evaluation training and skills when the Council is established. It is important that Indigenous Council members be effective contributors and that the decision-making process should not be immediately dominated by university educated members from urban areas to the intellectual exclusion of other Council members. Experience in research, monitoring and evaluation can come over time. Training in evaluation skills should be strongly encouraged and be part of the requirements for Indigenous Council members that can be achieved over time.

## Chapter 9 — Data for evaluation

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### INFORMATION REQUEST 9.1

*The Commission is seeking feedback on the indicators that are highest priority for inclusion in the data dictionary. What outcomes and indicators are most informative for government and Aboriginal and Torres Strait Islander people?*

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#### **The Commission is seeking feedback on the indicators that are highest priority for inclusion in the data dictionary**

The data dictionary needs to include existing Indigenous/non-Indigenous education (LLND (Foundation Skills, Indigenous VET Certificate III and above and higher education), income and employment and self-employment databases, not just databases on health and welfare. The inclusion in the data dictionary should not be limited to childhood education but needs to include adult Indigenous VET and higher education.

#### **What outcomes and indicators are most informative for government and Aboriginal and Torres Strait Islander people?**

Outcomes and indicators to create linking databases across Indigenous/non-Indigenous education (including LLND, VET and higher education), income and employment including on a geographic basis. These databases should also allow linkages to databases on health, welfare, domestic violence out of home care, arrest and incarceration rates.

Outcomes could include identifying what educational and employment factors would reduce the rate of arrest and incarceration. Outcomes could include the reduction in infant mortality compared to the mother/father's education, employment, self-employment and income.

Indicators could include the rate of change in domestic violence as education, employment, self-employment and income increases.

Indicators could also be assessed on mortality based on geographic location and availability of traditional Indigenous and western health care and first aid.

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### INFORMATION REQUEST 9.2

*Which data linkages would best support the Indigenous Evaluation Strategy? Which data linkages are important to Aboriginal and Torres Strait Islander people?*

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Data linkages across Indigenous/non-Indigenous education (including LLND, VET and higher education), income, employment and self-employment including on a geographic basis. These databases should also allow linkages to databases on health, welfare, domestic violence out of home care and incarceration rates.